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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ENRIQUE MARTINEZ,

Defendant.

CASE NO.: 2:21-cr-0169-RFB-BNW

**DEFENDANT ENRIQUE
MARTINEZ'S REQUEST FOR
TRAVEL**

COMES NOW, Defendant, ENRIQUE MARTINEZ, and hereby respectfully requests this Honorable Court issue an Order granting Defendant leave to travel outside the state of Nevada to Arleta, California, on December 23, 2021 through December 27, 2021 for the purpose of spending the holidays with his mother and children.

To date, Mr. Martinez has complied with all terms of his supervised release and same has been verified by the undersigned with his Pretrial Officer, Samira Barlow. Mr. Martinez's mother resides in California and Mr. Martinez would like to spend the Christmas holiday with her and his two younger daughters. If permitted, he will drive to California on December 23rd with his two daughters and will stay with his mother, Blanca, at 13688 Bracken Street, Arleta, California 91331 for the duration of his trip. Mr. Martinez is requesting permission to travel out of the jurisdiction for a three-day period and will return to Las Vegas on December 27, 2021.

The Defense made contact with both AUSA Kimberly Sokolich and Defendant's Pre-Trial Services Officer Samira Barlow regarding the instant request on December 6, 2021. AUSA Sokolich

1 advised she would defer to Pre-Trial Services and Officer Barlow has advised that Mr. Martinez has been
2 compliant with all the terms of his pretrial release and would be verifying the travel information with Mr.
3 Martinez's mother, who is a Spanish speaker. Unfortunately, the undersigned has been informed that a
4 Spanish speaking officer will not be available to verify this information until Monday, December 13,
5 2021. Because this request is for holiday travel and time is of the essence, the undersigned is filing the
6 instant motion before Monday to avoid further delay. However, it is anticipated that the travel
7 information will be verified as soon as Pretrial Services is available to make contact with Mr. Martinez's
8 mother on Monday and the undersigned will supplement this motion accordingly.

9
10 For these reasons, Mr. Martinez respectfully requests the Court grant his Motion for Travel from
11 the period of December 23, 2021 through December 27, 2021.

12 Dated this 9th day of December, 2021.

13 /s/ Ivette Amelburu Maningo

14 Ivette Amelburu Maningo, Esq.
15 400 S. 4th St. #500
16 Las Vegas, Nevada
Attorney for Defendant

17 **CERTIFICATE OF ELECTRONIC SERVICE**

18 The undersigned hereby certifies that on the 9th day of December, 2021 I served an electronic
19 copy of the above DEFENDANT ENRIQUE MARTINEZ'S REQUEST FOR TRAVEL to all parties of
20 record via CM/ECF.

21 /s/ Wildalia Coulson

22 Employee of The Law Offices of Ivette Amelburu Maningo

23
24 Having reviewed ECF No. 48, IT
25 IS ORDERED that ECF No. 45 is
GRANTED.

26 **IT IS SO ORDERED**

27 **DATED:** 3:20 pm, December 14, 2021

28 

BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE